

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Robert E. Crimo, Jr.
Case No. 23-13722 Chapter 7

All Cases: Moving Creditor HSBC Bank USA, N.A., as Trustee for Structured Adjustable Rate Mortgage Loan
Trust Mortgage Pass-Through Certificates, Series 2004-12 Date Case Filed October 13, 2023

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report filed on _____
☒ No-Asset Report not filed. Date of Creditor's Meeting: 11/16/23

1. Property

- a. ☒ Home 1566 McDaniels Avenue, Highland Park, IL 60035;
b. ☐ Car Year, Make, and Model _____
c. ☐ Other (describe) _____

2. Balance Owed as of October 19, 2023: \$514,426.74
Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$300,981.00, Schedule A/B.

5. Default

- a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
- b. ☐ Post-Petition Default
- i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
- ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)
- i. ☐ No insurance
- ii. ☐ Taxes unpaid Amount \$ _____
- iii. ☐ Rapidly depreciating asset
- iv. ☐ Other _____
- b. ☐ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)
- c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)
- i. ☐ Bad Faith (describe) _____
- ii. ☐ Multiple filings
- iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☒ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: 12/15/2023

Respectfully submitted,

/s/ Todd J. Ruchman

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Attorneys for Creditor

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